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Attorneys for
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

IN THE MATTER OF THE SEIZURE OF
\$6,189.00 IN U.S. CURRENCY,
\$3,384.00 IN U.S. CURRENCY,
\$6,738.00 IN U.S. CURRENCY,
\$7,826.00 IN U.S. CURRENCY,
CARTIER STYLE BRACELET, ROLEX
PRESIDENTIAL WATCH, AND 14K
YELLOW GOLD TENNIS NECKLACE

CR MISC. No. 2:25-cm-00037

STIPULATION EXTENDING UNITED
STATES OF AMERICA'S DEADLINE TO
FILE COMPLAINT FOR FORFEITURE;
[PROPOSED] ORDER THEREON LODGED
UNDER SEPARATE COVER

It is hereby stipulated by and between the United States of
America ("United States" or "the government") and claimant Carli
Cianciulli ("claimant"), by and through their respective attorneys,
as follows:

1. Pursuant to the claim that the United States alleges was
received by the Drug Enforcement Administration ("DEA") on January
14, 2025, claimant filed a claim in the DEA administrative forfeiture

1 proceedings to \$6,189.00 in U.S. Currency (United States Asset
2 Identification Number 25-DEA-716463), \$3,384.00 in U.S. Currency
3 (United States Asset Identification Number 25-DEA-716465), \$6,738.00
4 in U.S. Currency (United States Asset Identification Number 25-DEA-
5 716468), \$7,826.00 in U.S. Currency (United States Asset
6 Identification Number 25-DEA-716472), Cartier Style Bracelet (United
7 States Asset Identification Number 25-DEA-717539), Rolex Presidential
8 Watch (United States Asset Identification Number 25-DEA-717540), and
9 14K Yellow Gold Tennis Necklace (United States Asset Identification
10 Number 25-DEA-717542). The \$6,189.00 in U.S. Currency, \$3,384.00 in
11 U.S. Currency, \$6,738.00 in U.S. Currency, \$7,826.00 in U.S.
12 Currency, Cartier Style Bracelet, Rolex Presidential Watch, and 14K
13 Yellow Gold Tennis Necklace are hereinafter collectively referred to
14 as "the property."

15 2. It is the United States' position that the DEA sent the
16 written notice of intent to forfeit required by 18 U.S.C.
17 § 983(a)(3)(A) to all known interested parties, the time has expired
18 for any person to file a claim to the property under 18 U.S.C.
19 § 983(a)(2)(A)-(E), and no person other than claimant has filed a
20 claim to the property as required by law in the administrative
21 forfeiture proceedings.

22 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is
23 required to file a complaint for forfeiture against the property
24 alleging that the property is subject to forfeiture within 90 days
25 after a claim has been filed in the administrative forfeiture
26 proceedings, which in this case would be April 14, 2025, unless the
27 Court extends the deadline for good cause shown or by agreement of
28 the parties.

1 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
2 by agreement to extend to July 14, 2025 the deadline by which the
3 United States is required to file a complaint for forfeiture against
4 the property alleging the property is subject to forfeiture, so that
5 the government can investigate this matter and determine whether this
6 matter can be resolved without the government having to file a
7 complaint.

8 5. Claimant knowingly, intelligently, and voluntarily gives
9 up any rights claimant may have under 18 U.S.C. § 983(a)(3)(A)-(C) to
10 require the United States to file a complaint for forfeiture against
11 the property alleging that the property is subject to forfeiture by
12 April 14, 2025 and any rights claimant may have to seek dismissal of
13 any complaint on the ground that it was not filed on or before such
14 date.

15 6. The parties agree that the deadline by which the United
16 States shall be required to file a complaint for forfeiture against

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the property alleging that the property is subject to forfeiture
shall be extended to July 14, 2025.

SO STIPULATED.

Dated: March 20, 2025

JOSPEH T. MCNALLY
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Chief, Criminal Division
JONATHAN GALATZAN
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Section



VICTOR A. RODGERS
Assistant United States Attorney
Asset Forfeiture and Recovery
Section

Attorneys for
UNITED STATES OF AMERICA

Dated: March 20, 2025

REBACK LAW OFFICE



JOEL A. REBACK

Attorney for Claimant
CARLI CIANCIULLI

*by Joel A. Reback
per
e-mail
authorization*

PROOF OF SERVICE BY ELECTRONIC MAIL

AND BY FIRST CLASS MAIL

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 312 North Spring Street, 11th Floor, Los Angeles, California 90012.

On March 21, 2025, I served copies of: **STIPULATION EXTENDING UNITED STATES OF AMERICA'S DEADLINE TO FILE COMPLAINT FOR FORFEITURE; [PROPOSED] ORDER THEREON LODGED UNDER SEPARATE COVER** on each person or entity named below:

X By Electronic Mail and by First Class Mail: By transmitting said documents(s) to the email address and regular mailing address listed below.

**Joel A. Reback, Esq.
REBACK LAW OFFICE
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joelrebackesq@aol.com**

I declare under penalty of perjury under the laws of the United States of America that I am employed in the office of a member of the bar of this Court, at whose direction the service was made, and that the foregoing is true and correct.

Executed on March 21, 2025, at Los Angeles, California.

/s/ Cecilia Anderson

CECILIA ANDERSON
Paralegal, FSA